

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA**

Case No.: 1:25-cv-20757-JB/Torres

JANE DOE,
Plaintiff,

v.

STEVEN K. BONNELL II,
Defendant.

_____/

**DEFENDANT STEVEN K. BONNELL’S UNOPPOSED MOTION TO SUBMIT
AUDIO EXHIBIT CONVENTIONALLY IN CONNECTION
WITH MOTION TO DISMISS FIRST AMENDED COMPLAINT**

Defendant Steven K. Bonnell (“Bonnell”) hereby files this Unopposed Motion to Submit Audio Exhibit Conventionally in Connection with his Motion to Dismiss First Amended Complaint (“Motion”), and in support states:

1. On September 4, 2025, the Court granted the Motion for Leave to File Amended Complaint filed by Plaintiff Jane Doe (“Plaintiff”) and provided Plaintiff an opportunity to cure any defective jurisdictional allegations. (*See* Order on Motion for Leave to Amend Complaint, ECF No. 119).

2. In an attempt to do so, the First Amended Complaint added allegations pertaining to a “fan” of Bonnell “with a screen name Abbymc”. (*See* Am. Compl., ECF No. 120, ¶¶ 14-16, 31, 33, & 35).

3. Bonnell's Motion addresses these new allegations and relies, in part, on an audio file of a non-sensitive, public video that was previously produced to Plaintiff as part Bonnell's discovery production.

4. Undersigned counsel intends to file the aforementioned audio file embedded in Exhibit H to the Declaration of Andrew B. Brettler in Support of the Motion, but in order to comply with CM/ECF Administrative Procedures, Bonnell respectfully requests that the Court enter an order allowing Bonnell to submit the audio file exhibit conventionally via USB flash drive or any method preferred by the Court.

WHEREFORE, Defendant Steven K. Bonnell respectfully requests that the Court grant this Motion and enter an Order allowing Bonnell to submit Exhibit H to the Declaration of Andrew B. Brettler in Support of Bonnell's Motion to Dismiss First Amended Complaint conventionally and granting such other and further relief as the Court deems necessary.

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(a)(3)

Undersigned counsel for Defendant Steven K. Bonnell conferred with counsel Plaintiff Jane Doe and certifies that Plaintiff has no objection to the relief requested in this Motion.

Dated: September 19, 2025

Respectfully submitted,

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Counsel for Steven K. Bonnell II

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 19 2025, a true and correct copy of the foregoing document was electronically filed with the Clerk of Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record, including those listed in the below Service List, via transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ Patricia M. Patino

Attorney

SERVICE LIST

Jane Doe v. Steven K. Bonnell II
Case No.: 1:25-cv-20757-JB

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